

ERIC J. HEIMANN
WSB #6-4504
Assistant United States Attorney
P. O. Box 668,
Cheyenne, WY 82003
307-772-2124 (phone)
307-772-2123 (fax)
eric.heimann@usdoj.gov

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2019 MAR 27 AM 10:35
STEPHAN HARRIS, CLERK
CHEYENNE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

Civil No. 19-cv-063-R

1106 JULIE LANE, POWELL,)
WYOMING,)

468 and 483 HAMILTON WAY,)
POWELL, WYOMING,)

TBD LANE 8½, POWELL,)
WYOMING,)

2016 POLARIS RANGER CREW 900-6)
EPS, BEARING VIN #)
3NSRVE877GG515816, AND ALL)
ACCESSORIES,)

2015 PJ UTILITY TRAILER,)
BEARING SERIAL NUMBER)
4P5C51623G1238657)

and)

ALL FUNDS DEPOSITED IN BIG)
HORN FEDERAL SAVINGS BANK)
ACCOUNTS ENDING IN 3915)
and 6395,)

Defendant-Properties.)

NOTICE OF FORFEITURE ACTION

TO: **Mr. Chad Lindsay**
c/o Ms. Gay Woodhouse, Esq.
Woodhouse Roden Nethercott LLC
PO Box 1888, Cheyenne, WY 82003

This notice of forfeiture action is provided to you under Supplemental Rule G(4) of the Federal Rules of Civil Procedure, which rule governs forfeiture actions *in Rem*.

1. DATE OF NOTICE: March 27, 2019
2. FORFEITURE COMPLAINT: On March 25, 2019, the United States government filed in the United States District Court for the District of Wyoming a verified complaint seeking forfeiture of the following Defendant-Properties:
 - a. **1106 Julie Lane, Powell, Park County, Wyoming**: Kattenhorn Sub #2, Lot 19. The record owner is NWTC.
 - b. **468 Hamilton Way, Powell, Park County, Wyoming**: Powell Lumber Sub., Lot 5, Blk. 78A. The record owner is NWTC.
 - c. **483 Hamilton Way, Powell, Park County, Wyoming**: Powell Lumber Sub., Lot 7, Blk. 78 (Block 78B). The record owner is NWTC.
 - d. **TBD Lane 8 ½, Powell, Park County, Wyoming**: First Development Park (Phase One), Lot 6 (4.10 AC). The record owner is NWTC.
 - e. **2016 Polaris Ranger Crew 900-6 – EPS and all accessories**: Model # R16RVE87A bearing vehicle identification number 3NSRVE877GG515816. Accessories include heater kit, K-tracks, K-roof, Pro-Fit glass windshield, and K-mount. This vehicle is registered to NWTC.
 - f. **2015 PJ Utility Trailer**: 83” x 16’ black utility trailer bearing serial number 4P5C51623G1238657. This trailer is registered to NWTC.
 - g. **All funds deposited in Big Horn Federal Savings Bank account ending in 3915**: Regular checking account held in the name of NWTC and Joe Bridges.
 - h. **All funds deposited in Big Horn Federal Savings Bank account ending in 6395**: Money market checking account held in the name of NWTC, Chad Lindsay, and Joe Bridges.

The complaint alleges that each of the Defendant-Properties is forfeitable to the United States under 18 U.S.C. § 981(a)(1)(C) as the proceeds of, and property derived from the proceeds of, healthcare fraud in violation of 18 U.S.C. § 1347.

3. FILING OF A VERIFIED CLAIM: Under Supplemental Rule G(5)(a)(ii), to contest the forfeiture you must file a verified claim within thirty-five (35) days after the date this notice is mailed. Failure to file a timely claim may result in the loss of any ownership interest you have in any Defendant-Property.
4. FILING OF AN ANSWER: You must then file an answer to the complaint or motion under Rule 12 of the Federal Rules of Civil Procedure within twenty-one (21) days after filing the verified claim. Again, failure to file a timely answer may result in the loss of any ownership interest you have in any Defendant-Property.
5. ATTORNEY FOR PLAINTIFF: The claim and answer must be served upon:

Eric J. Heimann
Assistant United States Attorney
P.O Box 668
Cheyenne, Wyoming

Failure to follow the requirements set forth above may result in judgment by default taken against you for the relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.

MARK A. KLAASSEN
United States Attorney

By:


ERIC J. HEIMANN
Assistant United States Attorney

CERTIFICATE OF SERVICE

It is hereby certified on the 27th day of March, 2019, a true and correct copy of the foregoing **Notice of Forfeiture Action** was served upon the following, via certified U.S. Mail and email:

Mr. Chad Lindsay
c/o Ms. Gay Woodhouse, Esq.
Woodhouse Roden Nethercott LLC
PO Box 1888, Cheyenne, WY 82003
gay@wrnlawfirm.com



ERIC J. HEIMANN
United States Attorney's Office